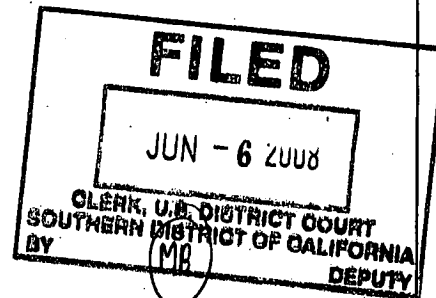


USA



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

Joel HARO-Higuera (1),

Juana RODRIGUEZ-Orozco (2),

Defendants.

Magistrate Case No.: 08MT 8513

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960
Importation of a Controlled
Substance (Felony)

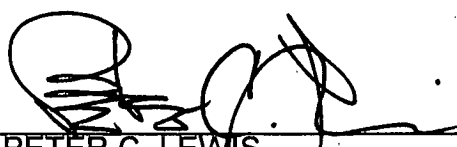
The undersigned complainant being duly sworn states:

That on or about June 5, 2008, within the Southern District of California, defendants Joel HARO-Higuera and Juana RODRIGUEZ-Orozco did knowingly and intentionally import approximately 61.22 kilograms (134.68 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Special Agent
Immigration & Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 6TH
DAY OF JUNE 2008.


PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Joel HARO-Higuera

4 Juana RODRIGUEZ-Orozco

5 STATEMENT OF FACTS

6 This statement of facts is based on the reports, documents, and notes furnished
7 to US Immigration and Customs Enforcement Special Agent Behm.

8 On June 5, 2008 at approximately 0553 hours, Joel HARO-Higuera and Juana
9 RODRIGUEZ-Orozco entered the United States at the Calexico, California, West Port
10 of Entry. HARO was the driver and RODRIGUEZ the passenger of a 1996 Mercury
11 Villager. The primary inspector, Customs and Border Protection Officer (CBPO) A.
12 Ramirez noticed that HARO was avoiding eye contact and not moving at all. CBPO
13 Ramirez asked RODRIGUEZ her name and she responded "Wal-Mart." HARO gave
14 the primary inspector a negative oral customs declaration. The vehicle was referred to
15 the secondary lot for closer examination.

16 In the vehicle secondary lot, CBPO C. Jones preformed a canine inspection of
17 the vehicle. The canine alerted and responded to the rear seat of the vehicle.

18 A subsequent inspection of the vehicle revealed 60 packages in the doors, rear
19 seat and quarter panels. Three of the packages were probed by CBPO Jones. One
20 contained a green leafy substance, which field tested positive for marijuana. One
21 contained seeds which field tested positive for marijuana. One contained an oily
22 substance that field tested positive for marijuana. The marijuana packages had a
23 combined weight of approximately 61.22 kilograms (134.68 pounds). The seeds had a
24 weight of 2.86 kilograms (6.29 pounds). The hash oil had a weight of 1.14 kilograms
25 (2.51 pounds).

26 HARO was placed under arrest and advised of his Constitutional Rights, which
27 he acknowledged and waived, agreeing to answer questions. HARO admitted
28
29

1 knowledge of drugs. HARO stated that RODRIGUEZ was to be paid \$1000.00 and he
2 was to receive \$2000.00 for smuggling controlled substances into he US.

3 RODRIGUEZ was placed under arrest and advised of her Constitutional Rights,
4 which she acknowledged and waived, agreeing to answer questions. RODRIGUEZ
5 admitted knowledge of contraband. RODRIGUEZ stated that she was to be paid 3000
6 pesos for her involvement.